



### TIER I OPERATING PERMIT

# State of Idaho Department of Environmental Quality

PERMIT NO.: 069-00001

AQCR: 62 CLASS: A

SIC:

2611

ZONE:

UTM COORDINATE (km): 501.9, 5141.3

11

### 1. PERMITTEE

Potlatch Corp., Lewiston facility

### PROJECT

Tier I Operating Permit - Idaho Pulp and Paperboard Division

3.	MAILING ADDRESS P.O. Box 1126	CITY Lewiston	STATE ID	<b>ZIP</b> 83501-1126
4. FACILITY CONTACT Susan Somers TITLE Environmental En		TITLE Environmental Engineering Manager	TELEPHO (208) 799-	5.45.75000
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6.	EXACT PLANT LOCATION 803 Mill Road, Lewiston, Idaho		COUNTY Nez Perce	(

### 7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS Pulp and paperboard manufacturing

# 8. PERMIT AUTHORITY

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.300 - 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by the Department on the cover page.

KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION

DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED:

December 17, 2002

DATE EXPIRES:

December 17, 2007

KB/KK/tk

Project No. T1-9506-064-1ippd

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# ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm actual cubic feet per minute

ADP air dried pulp

AQCR Air Quality Control Region

ASTM American Society for Testing and Materials
CERMS continuous emissions rate monitoring system

CFR Code of Federal Regulations

Cl<sub>2</sub> chlorine

CIO<sub>2</sub> chlorine dioxide CO carbon monoxide

CaO lime

COMS Continuous Opacity Monitoring System
CEMS Continuous Emission Monitoring System
Department Department of Environmental Quality

dscf Dry Standard Cubic Feet

EPA U.S Environmental Protection Agency

ESP electrostatic precipitator

ft foot or feet

gal/mo gallons per month gpm gallons per minute

gr grain (1 lb = 7,000 grains)

gr/dscf grains per dry standard cubic foot

HCI hydrogen chloride

IDAPA a numbering designation for all administrative rules in Idaho promulgated in accordance with the

Idaho Administrative Procedures Act

km kilometer

lb/day pounds per day lb/hr pound per hour

Ib/MMBtu pounds per million British thermal units
Ib sulfur/T ADP pounds of sulfur per ton of air dried pulp

lb/T pounds per ton

Ib/T ADP pounds per ton of air dried pulp
MMBtu/hr million British thermal units per hour

MMlb/mo million pounds per month

NESHAP National Emission Standards for Hazardous Air Pollutants

NGCS noncombustible gasses

NO<sub>x</sub> nitrogen oxides

NSPS New Source Performance Standards

O&M Operations and Maintenance

# ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

PM particulate matter

PM<sub>10</sub> particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers or

less

ppm parts per million

psig pounds per square inch gauge

PSD Prevention of Significant Deterioration

PTC permit to construct
PTO permit to operate
PW process weight

QA/QC Quality Assurance/Quality Control

RA Relative Accuracy

RAA Relative Accuracy Audit
RATA Relative Accuracy Test Audit
SIC Standard Industrial Classification
SIP State Implementation Plan

SO<sub>2</sub> sulfur dioxide

tADP/tCaO tons of air dried pulp per ton of lime

T/hr tons per hour
T/mo tons per month

T/R Transformer-Rectification

TRS total reduced sulfur

T/yr tons per year

U.S.C. United States Code

UTM Universal Transverse Mercator

VOC vola tile organic compound

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# 1. FACILITY-WIDE CONDITIONS{TC \L1 "1. FACILITYWIDE CONDITIONS}

The following table contains a summary of requirements that apply generally to emissions units at the facility.

Table 1.1 FACILITY-WIDE APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
1.1	Fugitive dust	Reasonable control	IDAPA 58.01.01.651	1.2, 1.3, 1.4, 1.9, 1.11
1.5	Odors	Reasonable control	IDAPA 58.01.01.776	1.6, 1.11
1.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 1.11
1.9	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	1.9-1.9.5, 1.11
1.10	Reports and certification	Compliance with IDAPA 58.01.01.322	IDAPA 58.01.01.322	1.10
1.12	Open burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600.616	1.11
1.13	Renovation or demolition	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	1.11
1.14	Risk management	Compliance with IDAPA 58.01.01.322; 40 CFR 68	IDAPA 58.01.01.322; 40 CFR 68	1.11
1.15	Air quality standards	EPA reference test methods	IDAPA 58.01.01.157	1.11, 1.18
1.16	Fuel-burning equipment	Natural gas - 0.015 gr/dscf at 3% oxygen Liquid - 0.05 gr/dscf at 3% oxygen	IDAPA 58.01.01.676, 677	1.11
1.17	Fuel oil sulfur content limit	ASTM Grade 1 fuel oil – 0.3% by weight; ASTM Grade 2 fuel oil – 0.5% by weight; Residual oil – 1.75% by weight	IDAPA 58.01.01.727, 728	1.11
1.18	Criteria air pollutants, opacity	Compliance testing	IDAPA 58.01.01.157	1.11, 1.15

# Fugitive Emissions

1.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650, 651, 5/1/94]

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1.2. The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

1.3. The permittee shall maintain a record of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

1.4. The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each monthly inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions are present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

### **Odors**

1.5. No person shall allow, suffer, cause, or permit the emissions of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775, 776, 5/1/94]

1.6. The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The record shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

### Visible Emissions

1.7. No person shall discharge any air pollutant to the atmosphere from any point of emissions for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason(s) for the failure of the emissions to comply with the requirements of this condition.

[IDAPA 58.01.01.625, 4/5/00]

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1.8. In addition to the specific requirements in Permit Conditions 2.6, 5.9, 7.7, 11.6, 15.5, and 16.4, the permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. If any visible emissions are present from any point of emissions, the permittee shall take appropriate corrective action as expeditiously as practicable. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each monthly visible emissions inspection. The record shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

### **Excess Emissions**

- 1.9. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 1.9 and the regulations of IDAPA 58.01.01.130-136.
- 1.9.1 The person responsible for or in charge of a facility during an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing such excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emissions standard is exceeded; and shall, as provided below or upon request of the Department, submit a full report of such occurrence including a statement of all known causes and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

1.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emissions unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

[IDAPA 58.01.01.133, 4/5/00]

 A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or Wood Stove Curtailment Advisory has been declared by the Department.

[IDAPA 58.01.01.133.01.a, 3/20/97]

 Notifying the Department of the excess emissions event as soon as reasonably possible, but no later than two hours prior to the start of the event, unless the owner or operator demonstrates to the Department's satisfaction that a shorter advanced notice was necessary.

[IDAPA 58.01.01.133.01.b, 4/5/00]

• The owner or operator of a source of excess emissions shall report and record the information required pursuant to Permit Conditions 1.9.4 and 1.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.c, 3/20/97]

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1.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/5/00]

1.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

• The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event to minimize the impact of such excess emissions on the ambient air quality and public health.

[IDAPA 58.01.01.134.02.a, 4/5/00]

• The owner or operator shall notify the Department of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to the Department's satisfaction that the longer reporting period was necessary.

[IDAPA 58.01.01.134.02.b, 4/5/00]

• The owner or operator shall report and record the information required pursuant to Permit Conditions 1.9.4 and 1.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c, 3/20/97]

1.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, the Department may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by the Department shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03 4/5/00]

1.9.4 A written report for each excess emissions event shall be submitted to the Department by the owner or operator no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135.01, 02, 3/20/97]

1.9.5. The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The excess emissions records shall be made available to the Department upon request and shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]

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 An excess emissions record book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to the Department pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment.

[IDAPA 58.01.01.136.03.a, 4/5/00]

• Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, and safety preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.b, 3/20/97]

# Reports and Certifications

1.10 All periodic reports and certifications required by this permit shall be submitted to the Department within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Lewiston Regional Office
1118 F St.
Lewiston, ID 83501

The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to the following:

EPA Region 10 Air Operating Permits, OAQ-107 1200 Sixth Ave. Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 5/1/94]

# Monitoring and Recordkeeping

1.11 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the dates, places, and times of sampling or measurements; (b) the dates analyses were performed; (c) the companies or entities that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to Department representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94]

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# Open Burning

1.12 The facility shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

[IDAPA 58.01.01.600-616, 3/19/99]

### Renovation/Demolition

1.13 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

# Regulated Substances for Accidental Release Prevention

- 1.14 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions in 40 CFR 68 no later than the latest of the following dates:
  - Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
  - The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

### **Test Methods**

1.15 If testing is required, the permittee shall use the test methods listed in Table 2.1 to measure the pollutant emissions.

Table 1.2 EPA REFERENCE TEST METHODS

Pollutant	Test Method*	Special Conditions
PM <sub>10</sub>	EPA Method 201.a and EPA Method 202	
PM	EPA Method 5	
СО	EPA Method 10	
VOC	EPA Method 25 or 25A	VOCs are to be expressed as carbon
Opacity	EPA Method 9	If an NSPS source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

<sup>\*</sup> Or a Department-approved alternative in accordance with IDAPA 58.01.01.157

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# Fuel-burning Equipment

1.16 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for natural gas, 0.05 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid fuel.

[IDAPA 58.01.01.676-677, 5/1/94]

### Sulfur Content

- 1.17 No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:
  - ASTM Grade 1 fuel oil 0.3% by weight
  - ASTM Grade 2 fuel oil 0.5% by weight
  - Residual oil 1.75% by weight

[IDAPA 58.01.01.727, 728, 5/1/94]

# **Compliance Testing**

1.18 If testing is required, the permittee shall provide notice of intent to test to the Department at least 30 days prior to the scheduled test. This time period may be shortened with Department approval, or if allowed in a permit, order, consent decree. The Department may, at its option, have an observer present at any emissions tests conducted on a source. The Department requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior Department approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval from the Department for any testing deviations, the Department may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is encouraged to submit in writing to the Department, at least 30 days in advance, the following for approval:

- The type of test method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

Unless a longer time is approved by the Department, within 30 days following the date in which a compliance test required by this permit is concluded, the permittee shall submit a report to the Department for the test. This compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

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The proposed test date(s), test date rescheduling notice(s), compliance test reports, and all other correspondence shall be sent to the following:

Air Quality Permit Compliance Department of Environmental Quality Lewiston Regional Office 1118 F St. Lewiston, ID 83501

Phone: (208) 799-4370 Fax: (208) 799-3451

[IDAPA 58.01.01.157,4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

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### 2. EMISSIONS UNIT GROUP 1 - POWER BOILERS NOS. 1, 2, AND 3

Table 2.1 below describes the devices used to control emissions from the power boilers.

TABLE 2.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emissions Units(s)/Process(es)	Emission Control Device
240 and 253	Power boilers Nos. 1 and 2, oil- or natural gas-fired	None
254	Power boiler No. 3, natural gas-fired	None

Table 2.2 contains a summary of requirements that apply to boilers Nos.1, 2, and 3. Specific permit requirements are listed below Table 2.2.

Table 2.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
2.1	PM	0.050 gr/dscf at 3% oxygen (oil); 0.015 gr/dscf at 3% oxygen (gas)	IDAPA 58.01.01.677	2.5, 2.6
2.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.5, 2.6

# **Emission Limits**

2.1 A person shall not discharge PM to the atmosphere from any fuel-burning equipment in operation prior to October 1, 1979, in excess of the concentrations shown in Table 2.3.

Table 2.3 POWER BOILER ALLOWABLE PARTICULATE MATTER EMISSIONS

Fuel Type	Allowable Particulate Emissions	Percent Oxygen
Gas	0.015 gr/dscf	3%
Oil	0.050 gr/dscf	3%

The effluent gas shall be corrected to the oxygen concentration shown.

[IDAPA 58.01.01.677, 4/5/00]

2.2 A person shall not discharge any air pollutant to the atmosphere from any point of emissions for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

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# **Operating Requirements**

2.3 The steaming rate for the 170-psig steam header to the two thermocompressors shall not exceed 55.8 MMlb/mo.

[PTC No. 069-00001, 8/31/01]

# Monitoring and Recordkeeping

- 2.4 The permittee shall continuously monitor and record the steaming rate from the 170-psig steam header to the two thermocompressors in pounds per hour. The monitoring unit shall provide 95% data capture on a monthly basis or alternate data capture as provided by the Department. A compilation of the most recent five years of records shall be kept onsite and shall be made available to Department representatives upon request.
- 2.5 The permittee shall record the steaming rate based on a monthly average of all steaming rate measurements taken during each monthly period. A compilation of the most recent five years of records shall be kept onsite and shall be made available to Department representatives upon request.

[PTC No. 069-00001, 8/31/01]

2.6 The permittee shall conduct quarterly one-minute observations of each affected emissions point, while burning oil, for any boiler that burns oil more than 100 hours in a quarter, using EPA Method 22 (in 40 CFR 60, Appendix A). If visible emissions are observed for any emissions point, a six-minute observation using EPA Method 9 shall be conducted or appropriate repairs shall be completed within 24 hours. A visible emissions retest shall be conducted following completion of such repairs. If four consecutive readings indicate that opacity is below 20%, the frequency of observations decreases to once per quarter. If any quarterly Method 9 observation indicates opacity is greater than 20%, observation frequency reverts to monthly.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

2.7 To demonstrate compliance with Permit Condition 1.17, the permittee shall keep records of the sulfur content of each fuel oil delivery as provided by the fuel oil supplier.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

### 3. EMISSION UNIT GROUP 2 - POWER BOILER NO. 4

Table 3.1 below describes the devices used to control emissions from the power boiler.

Table 3.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emissions Units(s)/Process(es)	<b>Emission Control Device</b>
781	Combustion Engineering boiler burning wood waste, oil, natural gas and other waste materials installed in 1980	Multiclones, Electrostatic precipitator

Table 3.2 contains a summary of the requirements that apply to power boiler No. 4. Specific permit requirements are listed below Table 3.2.

Table 3.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
3.1	PM	0.10 lb/MMBtu	40 CFR 60.42(a)(1)	3.6, 3.7, 3.8
3.2	Opacity	20%, except for 6 min/hr not to exceed 27%	40 CFR 60.42(a)(2)	3.6, 3.8
3.3	SO <sub>2</sub>	0.80 lb/MMBtu	40 CFR 60.43(a)(1)	3.9
3.4	NO <sub>x</sub>	Gas/wood: 0.2 lb/MMBtu; Oil/wood: 0.3 lb/MMBtu; 842 T/yr	PSD permit	3.6, 3.10

### **Emission Limits**

3.1 No person shall discharge to the atmosphere any gases which contain PM in excess of 0.10 lb/MMBtu derived from fossil fuel or fossil fuel and wood residue.

[40 CFR 60.42(a)(1), 6/14/74]

3.2 No person shall discharge to the atmosphere any gases which exhibit greater than 20% opacity, except for one six-minute period per hour of not more than 27% opacity.

[40 CFR 60.42(a)(2), 6/14/74]

3.3 No person shall discharge to the atmosphere any gases which contain SO<sub>2</sub> in excess of 0.80 lb/MMBtu derived from liquid fossil fuel or liquid fossil fuel and wood residue.

[40 CFR 60.43(a)(1) and (b), 6/14/74]

3.4 The permittee shall not discharge to the atmosphere any gases from power boiler No. 4 which contain  $NO_x$  in excess of 0.20 lb/MMBtu, 3-hour average, derived from gaseous fossil fuel alone or combination with wood waste, and 0.30 lb/MMBtu, 3-hour average, derived from liquid fossil fuel or liquid fossil fuel and wood residue. When different fossil fuels are burned simultaneously in any combination, the applicable standard is determined by the formula in 40 CFR 60.44(b). The  $NO_x$  emissions shall not exceed 842 T/yr.

[EPA PSD approval, PSD-X80-18, 9/30/80]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

# **Operating Requirements**

3.5 The boiler fuel may include the following: wastepaper, cafeteria waste, straw, tire chips (shredded motor vehicle tires), clarifier sludge, creosote-treated railroad ties, municipal wastepaper, turpentine (up to 3,500 gal/mo), on-specification used oil generated onsite and meeting the requirements of 40 CFR 279, and plastic drool (waste from extruding machines), in any combination of the above up to 20% of the total fuel rate on a dry basis. However, the total sulfur in the fuel mixture shall not exceed 0.5% dry basis.

[IDAPA 58.01.01.322.01, 3/19/99],

# Monitoring and Recordkeeping

3.6 The permittee shall install, calibrate, maintain, and operate a continuous opacity monitor and continuous emissions monitor for NO<sub>x</sub> on the boiler stack.

[40 CFR 60.45(a)(COM only), EPA PSD Approval, PSD-X80-18, 9/30/80]

3.7 While combusting wood products, the permittee shall conduct a PM performance test at maximum desired operating capacity in accordance with the procedures outlined in 40 CFR 60, Appendix A, Method 5; or a Department-approved alternative method, as provided in Permit Condition 1.15. The test shall be conducted within 12 months of issuance of this permit to demonstrate compliance with Permit Condition 3.1. The permittee shall monitor and record the steam production rate of the boiler during each test.

If the particulate emissions measured in the initial performance test are less than or equal to 75% of the emissions standard in Permit Condition 3.1, periodic performance tests shall be conducted every three years. If the particulate emissions measured during the performance test are greater than 75%, but less than or equal to 90% of the emissions standard in Permit Condition 3.1, a second test shall be required in the second year of the permit term. If the particulate emissions measured during the performance test are greater than 90% of the emissions standard in Permit Condition 3.1, the permittee shall conduct a performance test annually.

[IDAPA 58.01.01.322.06, 09, 5/1/94]

- 3.8 Within 60 days of issuance of this permit, the permittee shall have developed an O&M manual for the air pollution control equipment that incorporates manufacturer operating specifications and recommendations. The manual shall be updated as necessary and shall include, at a minimum, the following:
  - Normal operating conditions, parameters, and procedures
  - Startup, shutdown and malfunction procedures
  - Guidelines for normal maintenance schedules and procedures

The O&M manual shall remain onsite at all times and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.322.06 (state-only), 5/1/94]

- 3.9 The permittee shall maintain records of the materials tested in Permit Condition 3.5 that are combusted each month in order to document compliance with fuel rate and sulfur limits in Permit Condition 3.5.

  [IDAPA 58.01.01.322.06, 07, 5/1/94]
- 3.10 The permittee shall maintain records of the sulfur content of each shipment of oil to be used in the boiler based on fuel supplier certifications. Each month the permittee shall calculate the maximum SO<sub>2</sub> emission rate for the month in pounds per million British thermal units.

[IDAPA 58.01.01.322.01, 3/19/99]

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3.11 To determine compliance with the ton-per-year NO<sub>x</sub> emission limit in Permit Condition 3.4, each month the permittee shall calculate the monthly emissions and annual emissions for the previous 12-month period.

[IDAPA 58.01.01.322.01, 3/19/99]

3.12 The permittee shall comply with the recordkeeping requirements of 40 CFR 60.7(b) and (e), except that the records shall be retained for at least five years from the date of the record.

[40 CFR 60.7(b) and (e); IDAPA 58.01.01.322.07, 5/1/94]

# Reporting Requirements

3.13 Excess emissions of NO<sub>x</sub> shall be reported to the Department and EPA Region X on a quarterly basis. **[EPA PSD Approval, PSD X-80-18, 9/30/80]** 

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

# 4. EMISSIONS UNIT GROUP 3 - TEMPORARY BOILERS (2)

Table 4.1 below describes the devices used to control emissions from the temporary boiler.

Table 4.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICE

Emission Point ID	Emissions Units(s)/Process(es)	Emission Control Device
82, 83	Natural gas-fired boilers (2)	None

Table 4.2 contains only a summary of requirements that apply to the temporary boilers when they are present at the facility. Specific permit requirements are listed below Table 4.2.

TABLE 4.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
4.1	PM	0.015 gr/dscf at 3% oxygen	IDAPA 58.01.01.676	4.3, 4.4
4.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	4.3, 4.4
4.5	NSPS fuel-use log	Amount of fuel burned each day	40 CFR 60.48c(g)	4.5

### **Emission Limits**

4.1 No person shall discharge to the atmosphere from any fuel-burning equipment with a maximum rated input of 10 MMBtu/hr, or more, and commencing operation on or after October 1, 1979, PM in excess of the concentrations shown in Table 4.3.

TABLE 4.3 TEMPORARY BOILER ALLOWABLE PARTICULATE MATTER EMISSIONS

Fuel Type	Allowable Particulate Emissions	Percent Oxygen
Gas	0.015 gr/dscf	3%

The effluent gas shall be corrected to the oxygen concentration shown.

[IDAPA 58.01.01.676, 4/5/00]

4.2 No person shall discharge any air pollutant to the atmosphere from any point of emissions for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

# Monitoring and Recordkeeping

4.3 The permittee shall record the amounts of fuel combusted during each day.

[40 CFR 60.48c(g)]

4.4 The permittee shall maintain the records required by Permit Condition 4.3 for a period of five years following the date of such record.

[IDAPA 58.01.01.311.07, 5/1/94]

4.5 Fuel combusted in the temporary boilers shall be natural gas exclusively.

[PTC No. 069-00001, 11/6/98]

4.6 No more than two temporary boilers shall be operated at any given time and these boilers shall each have a heat capacity less than 100 MMBtu/hr. The boilers may be located at either the Consumer Products Division or the Idaho Pulp and Paper Division.

[PTC No. 069-00001, 11/6/98]

4.7 The temporary boilers may be operated for unlimited hours, anytime one or more of the permanent boilers are shut down. The temporary boilers may also be operated concurrently with all of the permanent boilers for up to 30 days total operating time in any 12-month period.

[PTC No. 069-00001, 11/6/98]

4.8 For each temporary boiler, the permittee shall monitor and record the hours of operation, date of operation, and the operational status of all permanent boilers. This record shall be maintained onsite and shall be made available to Department representatives upon request.

[PTC No. 069-00001, 11/6/98]

# Reporting Requirements

4.9 If the temporary boilers are operated for the first time at this Potlatch facility, the permittee shall comply with the notification requirements of 40 CFR 60.48c(a). If these notification requirements have previously been met, no further notification is required.

[40 CFR 60.48c(a)]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

# 5. EMISSION UNIT GROUP 4 - NO. 4 RECOVERY FURNACE AND NO. 4 SMELT-DISSOLVING TANK

Table 5.1 describes the devices used to control emissions from Emissions Unit Group 4.

TABLE 5.1 EMISSION UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emissions Units(s)/Process(es)	Emission Control Device
189	Babcock & Wilcox recovery furnace, started up November 1970	Electrostatic precipitator
157	Research Cottrell smelt-dissolving tank, started November 1970	High-efficiency wet scrubber

Table 5.2 contains a summary of the requirements that apply to these sources. Specific requirements are listed below Table 5.2.

**TABLE 5.2 APPLICABLE REQUIREMENTS SUMMARY** 

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
5.1	PM from recovery furnace	0.040 gr/dscf at 8% oxygen 2 lb/T ADP	PTO No. 1140-0001	5.7, 5.8, 5.10
5.2	TRS from recovery furnace	15 ppm 0.5 lb sulfur/T ADP	PTO No. 1140-0001	5.7, 5.10
5.3	PM from smelt- dissolving tank	0.070 gr/dscf 0.4 lb/T ADP	PTO No. 1140-0001	5.8, 5.9
5.4	PM from smelt- dissolving tank after March 13, 2004	0.2 lb/T of black liquor solids fired	40 CFR 63.862(a)(1)(i)(B)	5.11
5.5	Opacity from recovery furnace	40% for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625.02	5.7
5.6	Opacity from smelt- dissolving Tank	20% for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	5.7

### **Emission Limits**

- 5.1 The PM emissions from the recovery furnace shall not exceed 0.040 gr/dscf at 8% oxygen nor 2 lb/T ADP.

  [PTO No. 1140-0001, 8/22/84]
- 5.2 The TRS from the recovery furnace shall not exceed 15 ppm nor 0.5 lb sulfur/T ADP, maximum daily average.

[PTO No. 1140-0001, 8/22/84]

5.3 The PM emissions from the smelt-dissolving tank shall not exceed 0.070 gr/dscf nor 0.4 lb/T ADP.

[PTO No. 1140-0001, 8/22/84]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

5.4 After March 13, 2004, in addition to complying with Permit Condition 5.3, PM emissions from the smelt-dissolving tank shall not exceed 0.2 lb/T of black liquor solids fired.

[40 CFR 63.862(a)(1)(i)(B), 1/12/01

5.5 Opacity from the recovery furnace shall not exceed 40% for a period or periods aggregating more than three minutes in any 60-minute period.

[IDAPA 58.01.01.625.02, 4/5/00]

The permittee shall not discharge to the atmosphere from the smelt dissolving tank any emissions for a period or periods aggregating more than three minute in any 60-minute period which are greater than 20% opacity as determined by IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

# Monitoring and Recordkeeping

5.7 The permittee shall continuously monitor and record opacity and TRS from the recovery boiler.

[PTO No. 1140-0001, 8/22/84]

The permittee shall conduct a PM performance test on each source at the maximum expected production rate, in accordance with the procedures in 40 CFR 60, Appendix A, Method 5. The tests shall be conducted within 12 months of issuance of this permit to demonstrate compliance with Permit Conditions 5.1 and 5.3. If the emissions measured in the initial test are less than 50% of the emission limit, no further testing shall be required during this permit term. If the emissions measured in the initial test are between 50% and 80% of the standard, a second test shall be required in the third year of the permit term. If the initial test exceeds 80% of the standard, an annual test shall be required.

The tests shall be conducted at the maximum expected operating capacity. The permittee shall monitor and record all relevant operating parameters during the test, including parameters needed to express emissions in the units set forth in Permit Conditions 5.1 and 5.3.

[IDAPA 58.01.01.322.06, 5/1/94]

5.9 The permittee shall conduct monthly one-minute observations of the smelt-dissolving-tank stack using EPA Method 22 (in 40 CFR 60, Appendix A). If visible emissions are observed from any emissions point, a six-minute observation using EPA Method 9 shall be conducted or appropriate repairs shall be completed with 24 hours. A visible emissions retest shall be conducted following completion of such repairs. If four consecutive readings indicate that opacity is below 20%, the frequency of observations decreases to once per quarter. If any quarterly Method 9 observation indicates opacity is greater than 20%, observation frequency reverts to monthly.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

- 5.10 Within 60 days of issuance of this permit, the permittee shall have developed an O&M manual for the air pollution control equipment that incorporates manufacturer operating specifications and recommendations. The manual shall be updated as necessary and shall include, at a minimum, the following:
  - Normal operating conditions, parameters, and procedures
  - Startup, shutdown and malfunction procedures
  - Guidelines for normal maintenance schedules and procedures

The O&M manual shall remain onsite at all times and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.322.06 (state-only), 5/1/94]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

5.11 After March 13, 2004, the permittee shall comply with the applicable monitoring, performance testing, recordkeeping, and reporting requirements in 40 CFR 63.864 to 63.867, for both the recovery furnace and smelt tank.

[40 CFR 63, Subpart MM, 1/12/01]

# Reporting Requirements

5.12 The permittee shall submit test protocols for the performance tests required in Permit Condition 5.8 to the Department for approval at least 30 days prior to the test date(s). The protocol shall specify how the tons of ADP will be determined.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

5.13 The permittee shall submit a report of the results of the performance tests required in Permit Condition 5.8, including all required process data, to the Department within 30 days after the date on which the performance test is concluded.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

5.14 The permittee shall report all exceedances of opacity and TRS limits, or control device operating parameters, in accordance with General Provision 24.

[IDAPA 58.01.01.311.08, 5/1/94]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

### 6. EMISSION UNIT GROUP 5 - NO. 5 RECOVERY BOILER

Table 6.1 describes the devices used to control emission from Emission Unit Group 5.

TABLE 6.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emission Units	Emission Control Device
721	Gotaverken Energy Systems recovery furnace, started up June 1987	Electrostatic precipitator rated at 99.7% efficiency

Table 6.2 contains a summary of the requirements that apply to these sources. Specific requirements are listed below Table 6.2.

TABLE 6.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements	
6.1	PM	58 lb/hr; 0.03 gr/dscf	PTC dated May 6, 1983	6.11, 6.12	
6.2	PM	0.044 gr/dscf at 8% oxygen	40 CFR 60.282(a)(1)(i) 40 CFR 63.862(a)(1)(i)(A) after March 14, 2004	6.11, 6.12, 6.13	
6.3	PM	4 lb/T ADP	IDAPA 58.01.01.821	6.11, 6.12	
6.4	Opacity	35%	40 CFR 60.282(a)(1)(ii)	6.11, 6.14	
6.5	СО	880 lb/hr, 3850 T/yr, 900 ppm	PSD permit X-84-01, later revised	6.10	
6.6	SO <sub>2</sub>	112 lb/hr, 490 T/yr, 50 ppm	PSD permit X-84-01, later revised	6.10	
6.7	NO <sub>x</sub>	160 lb/hr, 700 T/yr, 100 ppm	PSD permit X-84-01, later revised	6.12	
6.8	TRS	TRS 5 ppm at 8% oxygen 40 CFR 60.283(a)(2)		6.11	
6.9	TRS	0.5 lb sulfur/T ADP	IDAPA 58.01.01.819	6.11	

### **Emission Limits**

6.1 The PM emissions from the No. 5 recovery boiler shall not exceed 58 lb/hr or 0.03 gr/dscf.

[Permit No. 1140-0001, 5/6/83]

6.2 The PM emissions from the No. 5 recovery boiler shall not exceed 0.044 gr/dscf corrected to 8% oxygen.

[40 CFR 60.282(a)(1)(i), 2/23/78; 40 CFR 63.862(a)(1)(i)(A) after 3/13/04]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

6.3 The PM emissions from the No. 5 recovery boiler shall not exceed 4 lb/T ADP.

[IDAPA 58.01.01.821, 5/1/94]

Opacity from the No. 5 recovery boiler stack shall not exceed 35%. Emissions in excess of this limitation are not considered a violation provided the conditions in 40 CFR 60.284(e) are met.

[40 CFR 60.282(a)(1)(ii), 2/23/78]

- The CO emissions from the No. 5 recovery boiler shall not exceed 880 lb/hr, 3,850 T/yr, or 900 ppm on a dry basis at 8% oxygen. The hourly and concentration limits shall be averaged over each 24-hour day.

  [PSD permit X-84-01, 12/4/84]
- 6.6 The SO<sub>2</sub> emissions from the No. 5 recovery boiler shall not exceed 112 lb/hr, 490 T/yr, or 50 ppm on a dry basis at 8% oxygen. The hourly and concentration limits shall be averaged over each 24-hour day.

  [PSD permit X-84-01, 12/4/84, revised 10/20/94]
- 6.7 The NO<sub>x</sub> emissions from the No. 5 recovery boiler shall not exceed 160 lb/hr, 700 T/yr or 100 ppm, dry basis at 8% oxygen. The hourly and concentration limits are determined by EPA Method 7.

  [PSD permit X-84-01. 12/4/84, revised 10/20/94]

6.8 The TRS emissions from the No. 5 recovery boiler shall not exceed 5 ppm by volume on a dry basis corrected to 8% oxygen. Emissions in excess of this limitation are not considered a violation provided the conditions in 40 CFR 60.284(e) are met.

[40 CFR 60.283(a)(2), 2/23/78]

6.9 The TRS emissions from the No. 5 recovery boiler shall not exceed 0.5 lb/T ADP.

[IDAPA 58.01.01.819, 5/1/94]

### Monitoring and Recordkeeping

6.10 A continuous monitoring and recording system meeting the specification requirements in Appendix B of 40 CFR 60 shall be operated to monitor SO<sub>2</sub> and CO.

[PSD permit X-84-01, 12/4/84]

6.11 Continuous monitoring and recording systems meeting the specification requirements at 40 CFR 60.284(a) shall be operated to monitor opacity, TRS concentration, and oxygen percentage.

[40 CFR 60.284(a)(1) and (2), 2/23/78]

6.12 The permittee shall conduct a NO $_{\rm x}$  and PM performance test on the No. 5 recovery boiler at the maximum expected production rate in accordance with the procedures in 40 CFR 60, Appendix A, Methods 5 and 7. The tests shall be conducted with 12 months of issuance of this permit to demonstrate compliance with Permit Conditions 6.1, 6.2, 6.3, and 6.7. If the emissions measured in the initial test are less than 50% of all emission limits, no further testing shall be required during this permit term. If the emissions measured in the initial test are between 50% and 80% of any standard, a second test shall be required in the third year of the permit term. If the initial test exceeds 80% of any standard, an annual test shall be required.

[IDAPA 58.01.01.322.06, 5/1/94]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

6.13 After March 13, 2004, the permittee shall comply with the applicable monitoring, performance testing, recordkeeping, and reporting requirements in 40 CFR 63.864 to 63.867.

[40 CFR 63, Subpart MM, 1/12/01]

# Reporting Requirements

- 6.14 The permittee shall record and report to the EPA and Department all 12-hour averages of TRS concentrations above 5 ppm by volume and all six-minute average opacities that exceed 35%.
  - If the total duration of excess emission for the reporting period is less than 1% of the total operating time of the recovery furnace and the monitor downtime is less than 5% of the total operating time, then only a Summary Report Form need be submitted, as described in 40 CFR 60.7, Figure 1.
  - If the total duration of excess emissions for the reporting period is 1% or greater of the total operating time of the recovery furnace or the monitor downtime is 5% or greater of the total operating time, then the Summary Report Form and the excess emission report described in 40 CFR 60.7(c) shall be submitted.

[40 CFR 60.284(d)(1) and 60.7(d)]

6.15 The permittee shall submit test protocols for the performance tests required in Permit Condition 6.12 to the Department for approval at least 30 days prior to the test date(s). The protocol shall specify how the tons of ADP will be determined.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

6.16 The permittee shall submit a report of the results of the performance tests required in Permit Condition 6.12, including all required process data, to the Department within 30 days after the date on which the performance test is concluded.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

# 7. EMISSION UNIT GROUP 6 - NO. 5 SMELT-DISSOLVING TANK

Table 7.1 describes the devices used to control emissions from Emission Unit Group 6.

Table 7.1 EMISSIONS UNIT AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emission Units	Emission Control Device
204	Gotaverken Energy Systems tank; started up June 1987	High efficiency wet scrubber

Table 7.2 contains a summary of the requirements that apply to these sources. Specific requirements are listed below Table 7.2.

Table 7.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
7.1	PM	10.4 lb/hr and 45 T/yr	PTC, dated May 6, 1983	7.5, 7.7
7.2	PM	0.20 lb/T black liquor solids	40 CFR 60.282(a)(2) 40 CFR 63.862(a)(1)(i)(B) after March 14, 2004	7.5, 7.6, 7.7
7.3	PM	0.5 lb/T ADP IDAPA 58.01.01.824		7.5, 7.7
7.4	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	7.5, 7.7

### **Emission Limits**

- 7.1 The PM emissions from the smelt-dissolving-tank vent shall not exceed 10.4 lb/hr and 45 T/yr.

  [Permit 1140-0001, 5/6/83]
- 7.2 The PM emissions from the smelt-dissolving-tank vent shall not exceed 0.20 lb/T black liquor solids (dry weight).

[40 CFR 60.282(a)(2), 2/23/78; 40 CFR 63.862(a)(1)(i)(B) after 3/13/04]

- 7.3 The PM emissions from the smelt-dissolving-tank vent shall not exceed 0.5 lb/T ADP.

  [IDAPA 58.01.01.823, 5/1/94]
- 7.4 No person shall discharge any air pollutant to the atmosphere from any point of emissions for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

# Monitoring and Recordkeeping

- 7.5 To ensure compliance with Permit Conditions 7.1, 7.2 and 7.3, within 120 days of issuance of this permit, the permittee shall install, calibrate, maintain, and operate a continuous monitoring system that can be used to determine and record the pressure drop across the scrubber and the scrubbing-liquid flow rate at least once every successive 15-minute period using the procedures in § 63.8(c), as well as the following:
  - (i) The monitoring device used for the continuous measurement of the pressure drop of the gas stream across the scrubber must be certified by the manufacturer to the accurate to within a gage pressure of ±2 inches of water gage pressure.
  - (ii) The monitoring device used for continuous measurement of the scrubbing-liquid flow rate must be certified by the manufacturer to be accurate within ±5 percent of the design scrubbing-liquid flow rate.

The permittee shall establish appropriate operating ranges for these measured parameters.

[IDAPA 58.01.01.322.06, 5/1/94]

7.6 After March 13, 2004, the permittee shall comply with the applicable monitoring, performance testing, recordkeeping, and reporting requirements in 40 CFR 63.864 to 63.867.

[40 CFR 63, Subpart MM, 1/12/01]

7.7 The permittee shall conduct monthly one-minute observations of the smelt dissolving tank stack using EPA Method 22 (in 40 CFR 60, Appendix A). If visible emissions are observed from any emissions point, a six-minute observation using EPA Method 9 shall be conducted or appropriate repairs shall be completed with 24 hours. A visible emissions retest shall be conducted following completion of such repairs. If four consecutive readings indicate that opacity is below 20%, the frequency of observations decreases to once per quarter. If any quarterly Method 9 observation indicates opacity is greater than 20%, observation frequency reverts to monthly.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

### 8. EMISSION UNIT GROUP 7 - NOS. 4 AND 5 RECOVERY BOILER SALT-CAKE SYSTEMS

Table 8.1 describes the devices used to control emissions from Emission Unit Group 7.

Table 8.1 EMISSIONS UNIT AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emission Units	Emission Control Device
NA	Nos. 4 and 5 Salt-cake day silos	Baghouses

Table 8.2 contains a summary of the requirements that apply to these sources. Specific requirements are listed below Table 8.2.

Table 8.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
8.1	PM and PM <sub>10</sub>	pound-per-hour and ton-per- year limits	PTC No. 069-0001	8.3, 8.4, 8.5, 8.5, 8.7, 8.9
8.2	Opacity	20% for no more than three minutes in any 60- minute period	IDAPA 58.01.01.625	8.5, 8.6, 8.7, 8.9
8.3 and 8.4	Throughput	tons-per-month and tons- per-year limits	PTC No. 069-0001	8.8

### **Emission Limits**

- The PM and PM<sub>10</sub> emissions from the No. 4 recovery boiler salt-cake-system-baghouse stack shall not exceed 1.0 lb/hr and 2.0 T/yr and 2.0 lb/hr and 5.1 T/yr for the No. 5 recovery boiler salt-cake system.

  [PTC No. 069-00001, 1/29/97]
- 8.2 Visible emissions from either the No. 4 or No. 5 recovery boiler salt-cake-system-baghouse stacks shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period.

[IDAPA 58.01.01.625, 4/5/00]

# **Operating Requirements**

8.3 The maximum salt-cake throughput of the No. 4 recovery boiler salt-cake system shall not exceed 546 T/mo, or 4,250 T/yr.

[PTC No. 069-00001, 1/29/97]

The maximum salt-cake throughput of the No. 5 recovery boiler salt-cake system shall not exceed 1,650 T/mo, or 12,750 T/yr.

[PTC No. 069-00001, 1/29/97]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

8.5 The PM emissions from the No. 4 and No. 5 recovery boiler-salt-cake systems shall each be controlled using an Ultra Industries baghouse (Model BB-16100-AAR-IIG) or equivalent, with a minimum control efficiency of 99.96%.

[PTC No. 069-00001, 1/29/97]

- 8.6 Within 60 days of issuance of this permit, the permittee shall have developed an O&M manual for the air pollution control equipment that incorporates manufacturer operating specifications and recommendations. The manual shall be updated as necessary and shall include, at a minimum, the following:
  - Normal operating conditions, parameters, and procedures
  - Startup, shutdown and malfunction procedures
  - Guidelines for normal maintenance schedules and procedures

The O&M manual shall remain onsite at all times and shall be made available to Department representatives upon request.

[PTC No. 069-00001, 1/29/97]

# **Monitoring Requirements**

8.7 The permittee shall monitor and record monthly, the amount of salt cake fed to the No. 4 recovery boiler mix tank and the No. 5 recovery boiler mix tank from their respective day tanks in tons to determine compliance with Permit Conditions 8.3 and 8.4. All records shall remain onsite for a minimum five-year period and shall be made available to Department representatives upon request.

[PTC No. 069-00001, 1/29/97]

8.8 The permittee shall install, calibrate, maintain, and operate a monitoring device for the continuous measurement of the pressure drop across each salt-cake-system-baghouse. The pressure monitoring devices shall be certified by the manufacturer to be accurate within 1 inch of water gauge pressure, and shall be calibrated on an annual basis in accordance with manufacturer instructions. The pressure drops shall be recorded at a minimum of once per day while each recovery boiler salt-cake system is operating at normal capacity. All records shall remain onsite for a minimum five-year period and shall be made available to Department representatives upon request.

[PTC No. 069-00001, 1/29/97]

# Reporting and Recordkeeping Requirements

8.9 The permittee shall submit a written report semi-annually to the Department for all exceedances of any emission limit or operational requirement specified. The report shall contain the date, time, and duration of the exceedance if applicable, as well as any corrective action taken to remedy the cause of the exceedance.

[PTC No. 069-00001, 1/29/97]

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# 9. EMISSION UNIT GROUP 8 - LIME KILNS NOS. 3 AND 4

Table 9.1 describes the devices used to control emissions from Emission Unit Group 8.

Table 9.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emission Units	Emission Control Device
511	No. 3 lime kiln, natural gas-, oil- and coke-fired	Electrostatic precipitator
512	No. 4 lime kiln, natural gas-, oil-, coke-fired	Electrostatic precipitator, packed-bed scrubber

Table 9.2 contains a summary of the requirements that apply to these sources. Specific requirements are listed below Table 9.2.

Table 9.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
9.1	PM, PM <sub>10</sub> , SO <sub>2</sub> , NO <sub>x</sub> , CO, and TRS	pound-per-hour and tons-per year limits	PTC No. 069-0001	9.8 - 9.26
9.2	TRS	40 ppm at 10% oxygen for kiln No. 3, 50 ppm at 10% oxygen for kiln No. 4	PTC No. 069-00001	9.8, 9.12, 9.15, 9.23, 9.24
9.3	Opacity	25% for kiln No. 3 and 20% for kiln No. 4 for no more than three minutes in any 60-minute period	PTC No. 069-00001	9.9, 9.10, 9.12, 9.13, 9.15, 9.17, 9.21
9.4	SO <sub>2</sub> for kiln No. 4	20 ppm by volume	PTC No. 069-00001	9.8, 9.11, 9.15, 9.22
9.5	PM	1.0 lb/T ADP	PTC No. 069-00001	9.9, 9.10, 9.12, 9.13, 9.15, 9.16, 9.17, 9.21
9.6	PM (after March 14, 2004	0.064 gr/dscf at 10% oxygen	40 CFR 63.862(a)(1)(i)(C)	9.27
9.7	Throughput	9.6 T/hr each and 126,217 T/yr combined	PTC No. 069-0001	9.19

### **Emission Limits**

9.1 Emissions of PM, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>X</sub>, CO, and TRS from the Allis (Svedala) No. 3 and No. 4 lime kiln stacks shall not exceed any corresponding emission rate limits in the Table 9.3.

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Table 9.3 EMISSION LIMITS<sup>a</sup>-HOURLY (lb/hr) AND ANNUAL<sup>b</sup> (T/yr)

SOURCE	1	PM	Р	M <sub>10</sub>	S	O <sub>2</sub>	NO	x	СО		TRS
DESCRIPTION	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/day	T/yr	lb/12 hr	T/yr	T/yr
No. 3 lime kiln	5.2	34 <sup>c</sup>	5.2	34 <sup>c</sup>	153	21	766	194 <sup>c</sup>	80.4	44 <sup>c</sup>	12.6°
No. 4 lime kiln	5.2	34 <sup>c</sup>	5.2	34 <sup>c</sup>	10.4	15	766	194 <sup>c</sup>	80.4	44 <sup>c</sup>	12.6°

<sup>&</sup>lt;sup>a</sup> As determined by a pollutant-specific EPA reference method, or Department-approved alternative, or as determined by the Department's emission estimation methods used in this permit analysis.

[PTC No. 069-00001, 6/24/02]

9.2 The concentration of TRS compounds in the No. 3 lime kiln effluent shall not exceed 40 ppm by volume on a dry basis corrected to 10% oxygen as a monthly average, and 50 ppm by volume from the No. 4 lime kiln.

[PTC No. 069-00001, 6/24/02]

9.3 Emissions shall not exceed 25% opacity from the No. 3 lime kiln stack and 20% from the No. 4 lime kiln stack for a period or periods aggregating more than three minutes in any 60-minute period. Opacity shall be determined by a COMS as specified in Permit Condition 9.21 and by the procedures contained in IDAPA 58.01.01.625.04.

[PTC No. 069-00001, 6/24/02]

9.4 The SO<sub>2</sub> concentrations in the effluent of the No. 4 lime kiln stack shall not exceed 20 ppm by volume, 3-hour average.

[PTC No. 069-00001, 6/24/02]

9.5 The PM emissions from the lime kiln stacks shall not exceed 1 lb/T ADP.

[IDAPA 58.01.01.822, 5/1/94]

9.6 After March 13, 2004, PM emissions from the lime kiln stacks shall not exceed 0.064 gr/dscf corrected to 10% oxygen.

[40 CFR 63.862(a)(1)(i)(C), 1/12/01 and amended 7/19/01]

# **Operating Requirements**

9.7 The maximum hourly throughput of CaO for the lime kilns shall not exceed 9.6 T/hr each based on a 12-hour average. The maximum annual combined throughput of CaO to the No. 3 lime kiln and the No. 4 lime kiln shall not exceed 126,217 tons per any consecutive 12-month period.

[PTC No. 069-00001, 6/24/02]

<sup>&</sup>lt;sup>b</sup> As determined by multiplying the actual or allowable (if actual is not available) lb/hr emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

<sup>&</sup>lt;sup>c</sup> T/yr limit is for combined emissions from the No. 3 and No. 4 lime kilns

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 9.8 The NCGs shall be treated in the following manner:
- 9.8.1 The NCGs shall not be routed through or processed by the No. 3 lime kiln, except during periods when both the NCG incinerator and the No. 4 lime kiln are not operational due to maintenance, repair, upset, or breakdown.
- 9.8.2 NCG's shall not be routed through or processed by the No. 4 lime kiln, except during periods when the NCG incinerator is not operational due to maintenance, repair, upset or breakdown.
- 9.8.3 When conditions as those specified in Permit Condition 9.8.1 necessitate that NCGs be routed to the No. 4 lime kiln, the permittee shall conduct such routing and treatment of NCGs, including operations during the period of transition between utilized NCG emission control measures, in a manner representative of effective and efficient emission control of pollutants contained in NCGs or generated by the treatment of NCGs, and in compliance with applicable provisions of 40 CFR 63, Subpart S; and IDAPA 58.01.01.815 through 826.

[PTC No. 069-00001, 6/24/02]

- 9.9 The permittee shall install, maintain, and operate, in accordance with manufacturer specifications, the following control equipment:
- 9.9.1 An ESP on the No. 3 and No. 4 lime kiln stacks to control PM emissions.
- 9.9.2 A scrubber on the No. 4 lime kiln stack to control SO<sub>2</sub> emissions from the No. 4 lime kiln. The scrubber shall be installed downstream of the ESP and shall be operated whenever NCGs are routed to the No. 4 lime kiln.

[PTC No. 069-00001, 6/24/02]

- 9.10 The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, the following:
- 9.10.1 For both lime kilns, monitoring equipment to continuously measure the voltage and amperage applied on both sides of each T/R set to the discharge electrodes and each ESP field.
- 9.10.2 For lime kiln No. 4, monitoring equipment to continuously measure the pH and flow rate of the solution used by the caustic scrubber.

[PTC No. 069-00001, 6/24/02]

- 9.11 Within 60 days of issuance of this permit, the permittee shall have developed an O&M manual for the air pollution control equipment that incorporates manufacturer operating specifications and recommendations. The manual shall be updated as necessary and shall include, at a minimum, the following:
  - Normal operating conditions, parameters, and procedures
  - Startup, shutdown and malfunction procedures
  - Guidelines for normal maintenance schedules and procedures

The O&M manual shall also include procedures to ensure and demonstrate that all emissions resulting from the treatment of NCGs routed to the No. 4 lime kiln are routed to the scrubber, and the scrubber is functioning at its rated control efficiency when emissions reach the scrubber. The manual shall remain onsite at all times and shall be made available to Department representatives upon request.

[PTC No. 069-00001, 6/24/02; IDAPA 58.01.01.322.06, 5/1/94]

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9.12 The voltage and amperage applied on both sides of each T/R set to the discharge electrodes shall be maintained within manufacturer and O&M manual specifications. Documentation of both the manufacturer and O&M manual voltage and amperage specifications shall remain onsite at all times and shall be made available to Department representatives upon request.

[PTC No. 069-00001, 6/24/02]

9.13 The pH and flow rate of the solution used in the No. 4 lime kiln caustic scrubber shall be maintained within manufacturer and O&M manual specifications. Documentation of the scrubber pressure drop and scrubber media pH and flow rate specifications shall remain onsite at all times and shall be made available to Department representatives upon request.

[PTC No. 069-00001, 6/24/02]

# Monitoring and Recordkeeping Requirements

- 9.14 The permittee shall have developed and submitted to the Department for approval a CEMS testing and QA plan. The plan shall demonstrate that the NO<sub>x</sub>, SO<sub>2</sub>, and TRS CEMS and the COMS required by Permit Conditions 9.21 to 9.23 are functioning properly and accurately represent pollutant concentrations in the kiln effluent. The plan shall include, but not be limited to, the following:
- 9.14.1 Detailed descriptions of the sampling and analytical procedures that will be used for the testing.
- 9.14.2 Data quality objectives that clearly describe the purpose of the testing and the criteria used to evaluate the CEMS and COMS performance.
- 9.14.3 Proposed QA and QC measures used and a detailed description of such measures.
- 9.14.4 Provisions for periodic plan review and updates.

[PTC No. 069-00001, 6/24/02]

9.15 Periodic performance testing for PM and PM<sub>10</sub> emissions from the lime kiln stacks shall be accomplished by the permittee as follows. Emissions of PM and PM<sub>10</sub> shall be measured using EPA Test Methods 5, 201a, and 202 contained in 40 CFR 60, Appendix A, or comparable and equivalent methods approved in accordance with IDAPA 58.01.01.157. If the PM or PM<sub>10</sub> measured in the most recent performance test is less than or equal to 75% of any respective particulate standard listed in Permit Condition 9.1 or 9.5, then the permittee shall conduct periodic performance tests every three calendar years beginning within three calendar years from the most recent test date. If the PM or PM<sub>10</sub> measured in the most recent performance test is greater than 75% of any respective particulate standard listed in Permit Condition 9.1 or 9.5, then the permittee shall conduct periodic performance tests annually beginning within 12 months from the most recent test date. Annual performance tests shall be separated by a minimum of six months.

[PTC No. 069-00001, 6/24/02]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 9.16 The permittee shall monitor and record the voltage and amperage applied by each T/R set to the discharge electrodes hourly. The voltage and amperage recorded shall be consistent with the manufacturer and O&M manual units of measure. A compilation of the most recent five years of voltage and amperage records shall be kept onsite and shall be made available to Department representatives upon request.

  [PTC No. 069-00001, 6/24/02]
- 9.17 The permittee shall monitor and record the scrubber media flow rate and pH hourly when the scrubber is in operation. The most recent 5 years of pressure drop, flow rate, and pH records shall be kept onsite and shall be made available to Department representatives upon request.

[PTC No. 069-00001, 6/24/02]

9.18 The permittee shall monitor and record the hourly throughput of CaO in the lime kilns, based on a 3-hour average, 12-hour average, 24-hour (daily) average, and the annual throughput of CaO to the lime kilns, based on a 12-month rolling average. The throughput data shall be used in the exhaust gas flow rate calculation required in Permit Condition 9.24. A compilation of the most recent five years of records shall be kept onsite and shall be made available to Department representatives upon request.

[PTC No. 069-00001, 6/24/02]

9.19 When NCGs are treated by either lime kiln, the permittee shall monitor and record the date, time, and duration of treatment. The records shall also include an explanation why the NCG incinerator was not used to treat NCGs. A compilation of the most recent five years of records shall be kept onsite and shall be made available to Department representatives upon request.

[PTC No. 069-00001, 6/24/02]

9.20 The permittee shall install, calibrate, maintain, and operate COMS on the lime kiln stacks. Except for COMS system breakdowns, repairs, maintenance, calibration checks, and zero and span adjustments, the COMS shall be in continuous operation whenever the lime kilns are in operation. The installation and performance evaluation of the COMS shall be conducted in accordance with the applicable performance specification in 40 CFR 60, Appendix B.

[PTC No. 069-00001, 6/24/02]

9.21 The permittee shall install, calibrate, maintain, and operate SO<sub>2</sub> and NO<sub>x</sub> CEMS on the lime kiln stacks. The CEMS shall provide measurements on a dry parts per million basis. Except for CEMS breakdowns, repairs, maintenance, calibration checks, and zero and span adjustments, the CEMS shall be in continuous operation whenever the lime kilns are in operation. The installation and performance evaluation of the CEMS shall be conducted in accordance with Performance Specification 2, as applicable, in 40 CFR 60, Appendix B. The CEMS, in combination with continuous flow measurements required by Permit Condition 9.24, shall be capable of determining compliance with the limits of Permit Condition 9.1 and shall be operated in accordance with the requirements in 40 CFR 60, Appendix F. The CEMS, in combination with the exhaust-gas flow rate and emission rate calculations required by Permit Conditions 9.24 and 9.25, shall be capable of determining compliance with the NO<sub>x</sub> limit of Permit Condition 9.1 and shall be able to achieve RA requirements as specified under Performance Specification 6. The exhaust flow rate equation shall be reviewed and updated if the permittee fails to achieve the minimum Performance Specification 6 RA.

[PTC No. 069-00001, 6/24/02]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

9.22 The permittee shall install, calibrate, maintain, and operate a TRS CEMS on the lime kiln stacks. Except for TRS CEMS breakdowns, repairs, maintenance, calibration checks, and zero and span adjustments, the TRS CEMS shall be in continuous operation whenever the lime kilns are in operation. The installation and performance evaluation of the CEMS shall be conducted in accordance with Performance Specification 5 in 40 CFR 60, Appendix B. The CEMS shall be capable of determining compliance with the TRS limit of Permit Condition 9.2 and shall be operated in accordance with the requirements in 40 CFR 60, Appendix F. A CGA may be substituted for the annual RATA requirement.

[PTC No. 069-00001, 6/24/02]

9.23 The permittee shall continuously monitor and record the temperature and oxygen concentration on a dry basis of emissions from the lime kiln stacks.

[PTC No. 069-00001, 6/24/02]

### 9.24 Exhaust-gas Flow Rate Determination

The permittee shall calculate the three-hour average and daily (24-hour) average exhaust-gas volumetric flow rate from the lime kiln stacks, not corrected for oxygen, using the following equations:

$$Q_s = (F_d a + 13750b)(20.9/20.9 - c)$$

Where:

Q<sub>s</sub> = Lime kiln exhaust gas volumetric flow rate (dscf)

F<sub>d</sub> = F factor (dry basis) for fuel combusted as calculated using procedures in 40 CFR 60, Appendix A, Method 19 or as provide in Method 19, Table 19-1.

a = Lime kiln fuel heat input (MMBtu/averaging period) calculated from fuel use rate (R<sub>f</sub>) and fuel higher heating value (HHV) as follows:

 $a = R_f (units/hr) x HHV (MMBtu/unit)$ 

Fuel HHVs will be obtained from the fuel suppliers or determined through ultimate analysis. Fuel HHVs will be reviewed and updated (if necessary) at least annually.

b = Lime kiln production rate (tons CaO/averaging period)

c = oxygen percent (dry basis) in Lime Kiln exhaust gas

The accuracy of the calculation method shall be verified during the CEMS initial performance evaluations and at least annually during the CEMS performance evaluations required in Permit Condition 9.21.

[PTC No. 069-00001, 6/24/02]

### 9.25 NO<sub>x</sub> SO<sub>2</sub> and TRS Emission Rate Calculations

The permittee shall calculate the 3-hour average and 12-month rolling actual  $SO_2$  emission rates, the daily average and 12-month rolling actual  $NO_x$  emission rates, and the 12-month rolling actual TRS emission rate from the lime kiln using the average concentrations obtained from the CEMS required in Permit Conditions 9.21 and 9.22 and the calculated exhaust-gas flow rate required in Permit Condition 9.24 as follows:

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 $E_{hr} = C_s Q_s$  and  $E_{vr} = E_{hr}t$ 

Where:  $E_{hr} = Ib/hr$  mass emission rate for specified time averaging period.

 $E_{vr} = ton/yr mass emission rate (12-month rolling)$ 

 $Q_s$  = dscf/hr flow rate as calculated under Permit Condition 9.25 for the specified time

averaging period.

C<sub>s</sub> = lb/dscf stack gas concentration for specified time averaging period determined as

follows:

 $C_{SO2} = (ppm_d SO_2)(1.660 \times 10^{-7})$   $C_{NOx} = (ppm_d NO_x)(1.194 \times 10^{-7})$  $C_{TRS} = (ppm_d TRS)(8.806 \times 10^{-8})$ 

t = applicable pollutant time averaging period ( $SO_2 = 3 = hr$ ,  $NO_x = 24 - hr$ )

[PTC No. 069-00001, 6/24/02]

9.26 After March 13, 2004, the permittee shall comply with the applicable monitoring, performance testing, recordkeeping, and reporting requirements in 40 CFR 63.864 to 63.867.

[40 CFR 63, Subpart MM, 1/12/01]

# Reporting Requirements

9.27 The permittee shall submit test protocols for the performance tests required in Permit Conditions 9.14 and 9.15 to the Department for approval at least 30 days prior to the test date(s).

[PTC No. 069-00001, 6/24/02]

9.28 The permittee shall submit a report of the results of the performance tests required in Permit Conditions 9.14 and 9.15, including all required process data, to the Department within 30 days after the date on which the performance test is concluded.

[PTC No. 069-00001, 6/24/02]

- 9.29 The permittee shall submit a semiannual CEMS report to the Department in accordance with General Provision 24 that contains, but is not limited to, the following:
- 9.29.1 Calculated or measured emission rates for all applicable averaging periods for NO<sub>x</sub>, SO<sub>2</sub>, and TRS. Emission rates shall be calculated using CEMS data and calculated stack-flow measurements. These records may be provided in electronic format.
- 9.29.2 Identification of any monitoring results that indicate an exceedance of applicable requirements of this permit; 40 CFR 63, Subpart S; or IDAPA 58.01.01.

[PTC No. 069-00001, 6/24/02]

9.30 The permittee shall submit a semiannual report to the Department providing the results from monitoring required by Permit Condition 9.19. The report may be in electronic format and shall include a summary that contains, but is not limited to, the total time and percent of time when NCGs were routed to and/or treated by the each lime kiln. The report shall also contain any other information required by reporting requirements in 40 CFR 63, Subpart S; or IDAPA 58.01.01.

[PTC No. 069-00001, 6/24/02]

9.31 The permittee shall submit a semiannual report to the Department that contains data and results of throughput monitoring required by Permit Condition 9.18.

[PTC No. 069-00001, 6/24/02]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

#### 10. EMISSION UNIT GROUP 9 - LIME KILN NO. 2

Table 10.1 describes the devices used to control emissions from Emission Unit Group 9.

Table 10.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emission Units	Emission Control Device
510	No. 2 lime kiln, natural gas-fired	Venturi scrubber

Table 10.2 contains a summary of the requirements that apply to these sources. Specific requirements are listed below Table 10.2.

Table 10.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
10.1	PM	1.0 lb/T ADP	IDAPA 58.01.01.822	10.5 - 10.7, 10.9 - 10.12
10.2	PM	0.12 gr/dscf at 10% oxygen	PTC No. 069-00001	10.5 - 10.7, 10.9 - 10.12
10.3	PM (after March 14, 2004)	0.064 gr/dscf at 10% oxygen	40 CFR 63.862(a)(1)(i)(C)	10.13
10.4	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	10.5 - 10.7, 10.9 - 10.12

## **Emission Limits**

10.1 Emissions of PM from the No. 2 lime kiln shall not exceed 1 lb/T ADP.

[IDAPA 58.01.01.822, 5/1/94]

10.2 Emissions of PM from the No. 2 lime kiln stack shall not exceed 0.12 gr/dscf at 10% oxygen.

[PTC No. 069-00001, 6/24/02]

- 10.3 After March 13, 2004, PM emissions from the lime kiln stack shall not exceed 0.064 gr/dscf at 10% oxygen.

  [40 CFR 63.862(a)(1)(i)(C), 1/20/01]
- 10.4 Emissions from the No. 2 lime kiln stack, or any other stack, vent, or functionally equivalent opening associated with the No. 2 lime kiln, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.04.

[IDAPA 58.01.01.625, 5/1/94]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

# **Operating Requirements**

10.5 Material processed by the No. 2 lime kiln shall be limited to lime rock only. Lime mud shall not be processed by the No. 2 lime kiln.

[PTC No. 069-00001, 6/24/02]

10.6 The permittee shall maintain and operate the existing scrubber on the No. 2 lime kiln stack in accordance with manufacturer specifications.

[PTC No. 069-00001, 6/24/02]

- 10.7 The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, equipment to measure the liquor flow rate and the pressure drop across the scrubber.

  [PTC No. 069-00001, 6/24/02]
- 10.8 The sulfur content in fuel oil supplied to the No. 2 lime kiln shall not exceed 1.75% sulfur by weight. [IDAPA 58.01.01.727.02]

# Monitoring and Recordkeeping Requirements

- 10.9 If the No. 2 lime kiln is operated more than 30 days in any quarter, PM emissions from the No. 2 lime kiln stack shall be tested. Performance testing for PM emissions from the No. 2 lime kiln stack shall be accomplished by the permittee as follows. Emissions of PM from the No. 2 lime kiln stack shall be measured using EPA Test Method 5, contained in 40 CFR 60, Appendix A, or comparable and equivalent methods approved in accordance with IDAPA 58.01.01.157. If the PM measured in the most recent performance test is less than or equal to 75% of any respective particulate standard listed in Permit Conditions 10.1 or 10.2, then the permittee shall conduct periodic performance tests every three calendar years beginning within three calendar years from the most recent test date. If the PM measured in the most recent performance test is greater than 75% of any respective particulate standard listed in Permit Conditions 10.1 or 10.2, then the permittee shall conduct periodic performance tests annually beginning within 12 months from the most recent test date. Annual performance tests shall be separated by a minimum of six months. Performance tests conducted to demonstrate compliance shall be performed in accordance with IDAPA 58.01.01.157, Permit Condition 1.15, and the following requirements:
- 10.9.1 Visible emissions shall be observed during each performance test run using the methods specified in IDAPA 58.01.01.625.
- 10.9.2 The scrubber-solution flow rate and the pressure drop across the scrubber on the No. 2 lime kiln stack shall be recorded during each performance test.
- 10.9.3 The throughput in tons per hour of lime rock to the No. 2 lime kiln shall be recorded during each performance test.
- 10.9.4 The pounds of PM per ton of ADP shall be calculated based on results of the performance test, the throughput monitoring required by Permit Condition 10.10, and a production conversion factor of 3.64 tons air dried pulp per ton lime (tADP/tCaO).

[PTC No. 069-00001, 6/24/02]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

10.10 Each month, the permittee shall monitor and record the throughput of the No. 2 lime kiln for that month and for the most recent 12-month period. A compilation of the most recent five years of records shall be kept onsite and shall be made available to Department representatives upon request.

[PTC No. 069-0001, 6/24/02]

10.11 The permittee shall submit a test protocol for the performance test required in Permit Condition 10.9 to the Department for approval at least 30 days prior to the test dates.

[PTC No. 069-00001, 6/24/02]

10.12 The permittee shall submit a report of the results of the performance test required in Permit Condition 10.9 of this permit, including all required process data, to the Department within 30 days after the date on which the test is concluded.

[PTC No. 069-00001, 6/24/02]

10.13 After March 13, 2004, the permittee shall comply with the applicable monitoring, performance testing, recordkeeping, and reporting requirements in 40 CFR 63.864 to 63.867.

[40 CFR 63, Subpart MM, 1/12/01]

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## 11. EMISSION UNIT GROUP 10 - LIME HANDLING AND SLAKING

Table 11.1 describes the devices used to control emissions from Emission Unit Group 10.

Table 11.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emission Units	Emission Control Device
43	Lime slaker	Scrubber
47	Lime handling	Baghouse

Table 11.2 contains a summary of the requirements that apply to these sources. Specific requirements are listed below Table 11.2.

Table 11.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
11.1	PM from slaker scrubber	1.72 lb/hr, 7.53 T/yr	PTC 1140-00001	11.6
11.2	PM from lime handling	0.01 gr/acf	PTC 1140-00001	11.4, 11.6
11.3	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	11.6

## **Emission Limits**

- 11.1 The PM and PM<sub>10</sub> emissions from the slaker-scrubber stack shall not exceed 1.72 lb/hr or 7.53 T/yr.

  [PTC No. 1140-00001, 9/9/88]
- 11.2 The PM and PM<sub>10</sub> emissions from the lime-handling-baghouse stack shall not exceed 0.01 gr/acf. [PTC No. 1140-00001, 9/9/88]
- 11.3 A person shall not discharge any air pollutant to the atmosphere from any point of emissions for a period or periods aggregating more than three minute in any 60-minute period which is greater than 20% opacity as determined by IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

# Operating Requirements

11.4 The lime handling baghouse shall have a design flow of 6,000 acfm at 400°F and an air-to-cloth ratio of 3.9:1 with pulse-jet type cleaning.

[PTC No. 1140-00001, 9/9/88]

11.5 The slaker-scrubber stack shall meet the following specifications: 66.9 ft high, 1.3 ft diameter, and exhaust velocity of 2,500 ft per minute.

[PTC No. 1140-00001, 9/9/88]

## Monitoring and Recordkeeping Requirements

11.6 The permittee shall conduct monthly one-minute observations of the lime-handling baghouse and slaker-scrubber stacks using EPA Method 22 (in 40 CFR 60, Appendix A). If visible emissions are observed from any emissions point, a six-minute observation using EPA Method 9 shall be conducted or appropriate repairs shall be completed with 24 hours. A visible emissions retest shall be conducted following completion of such repairs. If four consecutive readings indicate that opacity is below 20%, the frequency of observations decreases to once per quarter. If any quarterly Method 9 observation indicates opacity is greater than 20%, observation frequency reverts to monthly.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

#### 12. EMISSION UNIT GROUP 11 - NCG INCINERATOR

Table 12.1 describes the devices used to control emissions from Emission Unit Group 11.

Table 12.1 EMISSION UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emission Units	Emission Control Device
106	Batch and continuous digesters, multiple effect evaporator system, and brownstock washers	NCG incinerator

Table 12.2 contains a summary of the requirements that apply to these sources. Specific requirements are listed below Table 12.2.

Table 12.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
12.1	SO <sub>2</sub>	4.70 lb/hr, 20.0 T/yr	PTC No. 069-00001	12.5, 12.8, 12.11-13, 12.15, 12.16
12.2	TRS	5 ppm at 10% oxygen	40 CFR 60.283(a)(1)	12.4, 12.6, 12.7, 12.9- 14, 12.16
12.3	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	12.4 - 12.6

# **Emission Limits**

12.1 The SO<sub>2</sub> emissions from the NCG incinerator/packed-bed absorber stack shall not exceed 4.70 lb/hr or 20.0 T/yr. The pound-per-hour SO<sub>2</sub> emission rate limit is a three-hour rolling average pound-per-hour emission rate limit.

[PTC No. 069-00001, 8/29/97]

12.2 The TRS emissions from the NCG incinerator/packed-bed absorber stack shall not exceed five ppm by volume on a dry basis, corrected to 10% oxygen. The TRS emission concentration limit is a 12-hour average emission limit pursuant to 40 CFR 60.284(c).

[PTC No. 069-00001, 8/29/97; 40 CFR 60.283(a)(1)(iii)]

12.3 Visible emissions from the incinerator/packed-bed absorber stack shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period.

[IDAPA 58.01.01.625, 4/5/00]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

# Operating Requirements

12.4 Temperature of the incinerator shall be maintained at or above 1,200°F at all times when waste gases are being supplied to the incinerator.

[PTC No. 069-00001, 8/29/97]

- 12.5 Within 60 days of issuance of this permit, the permittee shall have developed an O&M manual for the air pollution control equipment that incorporates manufacturer operating specifications and recommendations. The manual shall be updated as necessary and shall include, at a minimum, the following:
  - Normal operating conditions, parameters, and procedures
  - Startup, shutdown and malfunction procedures
  - Guidelines for normal maintenance schedules and procedures

The O&M manual shall remain onsite at all times and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.322.06, 5/1/94; PTC No. 069-00001, 8/29/97]

12.6 The NCGs originating from the kraft pulp mill's batch digesters, continuous digesters, multiple-effect evaporator system, and brownstock washers shall be thermally oxidized exclusively in either the incinerator or in a lime kiln.

[PTC No. 069-00001, 8/29/97]

# Monitoring and Recordkeeping Requirements

- The permittee shall calibrate, maintain, and operate a CEMS to monitor and record the concentration of TRS emissions, on a dry basis, and a CEMS to monitor and record the percent of oxygen by volume, on a dry basis, in the gases discharged to the atmosphere from the incinerator/packed-bed absorber stack. The TRS CEMS and oxygen CEMS shall be used directly for determining compliance with TRS emission concentrations in Permit Condition 12.2.
- 12.7.1 The installation and performance evaluations of the oxygen CEMS and the TRS CEMS shall be done in accordance with 40 CFR 60, Appendix B, Performance Specification 3; and 40 CFR 60, Appendix B, Performance Specification 5, respectively.
- 12.7.2 The quality assurance requirements specified in 40 CFR 60, Appendix F, are hereby required to be applicable to the oxygen CEMS and TRS CEMS.
- 12.7.3 The oxygen CEMS and TRS CEMS shall be in continuous operation except for system breakdowns, repairs, calibration checks, and zero and span adjustments. In addition, each CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period.

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

12.7.4 The permittee shall maintain a file containing measurement data and related information for the oxygen CEMS and a similar file for the TRS CEMS. The respective data and information in each file shall include, but not be limited to, the following: all CEMS output data, copies of all performance evaluation reports, daily calibration drift check data, written quality control procedures, documentation of all adjustments and maintenance on the CEMS, and copies of all information required to be submitted to the Department regarding the CEMS. The contents of the files shall be recorded in a permanent form suitable for inspection and shall be retained at the facility for at least five years following the date on which such data or information were recorded. Each file shall be made available to Department representatives upon request and shall be used to determine when NCGs are combusted in the incinerator.

[PTC No. 069-00001, 8/29/97]

- 12.8 The permittee shall calibrate, maintain, and operate a CERMS to monitor and record the rate of SO<sub>2</sub> emissions to the atmosphere from the incinerator/packed-bed absorber stack. The span value for the SO<sub>2</sub> concentration monitor portion of the SO<sub>2</sub> CERMS shall be 330 ppm or a Department-approved alternative value. The SO<sub>2</sub> CERMS shall be used directly for determining compliance with SO<sub>2</sub> emission rates in Permit Condition 12.1.
- 12.8.1 The installation and performance evaluations of the SO<sub>2</sub> CERMS shall be done in accordance with 40 CFR 60, Appendix B, Performance Specification 2; and 40 CFR 60, Appendix B, Performance Specification 6.
- 12.8.2 The quality assurance requirements specified in 40 CFR 60, Appendix F, are hereby required to be applicable to the SO<sub>2</sub> CERMS.
- 12.8.3 The SO<sub>2</sub> CERMS shall be in continuous operation except for system breakdowns, repairs, calibration checks, and zero and span adjustments. In addition, the CERMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period.
- 12.8.4 The permittee shall maintain a file containing measurement data and related information for the SO<sub>2</sub> CERMS including, but not limited to, the following: all CERMS output data, copies of all performance evaluation reports, daily calibration drift check data, written quality control procedures, documentation of all adjustments and maintenance on the CERMS, and copies of all information required to be submitted to the Department regarding the CERMS. The contents of the files shall be recorded in a permanent form suitable for inspection and shall be retained at the facility for at least five years following the date on which such data or information were recorded. Each file shall be made available to Department representatives upon request, and shall be used to determine when the NCGs are combusted in the incinerator.

[PTC No. 069-00001, 8/29/97]

An incinerator-temperature monitoring device shall be installed, calibrated, maintained, and operated according to manufacturer specifications to continuously measure and record the temperature of the incinerator combustion chamber. The monitor shall initially be certified by the manufacturer to be accurate within ± 1% of the temperature being measured. The temperature monitoring device shall be installed at the point of incineration of the effluent gases. Continuous temperature monitoring records shall be maintained onsite for the most recent five-year period and shall be made available to Department representatives upon request.

[PTC No. 069-00001, 8/29/97; 40 CFR 60.284(b)]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

12.10 The permitted shall calculate and record on a daily basis 12-hour average TRS concentrations and correct these concentrations to 10% oxygen by volume as specified in 40 CFR 60.284(c). These records shall be maintained onsite for the most recent five-year period and shall be made available to Department representatives upon request.

[PTC No. 069-00001, 8/29/97]

# Reporting and Recordkeeping Requirements

12.11 The permittee shall conduct an annual RA test and RATA for the oxygen and TRS CEMS and the SO<sub>2</sub> CERMS required in Permit Conditions 12.7 and 12.8. The permittee shall submit a notification to the Department in writing at least 30 days prior to the test date that states the date when the test will occur and identifies which approved protocol will be used for the test. New test protocols shall be submitted for approval for any annual RATA after any changes are made to the process at least 30 days prior to the test date for the oxygen and TRS CEMS and the SO<sub>2</sub> CERMS.

[PTC No. 069-00001, 8/29/97]

12.12 The reporting requirements specified in 40 CFR 60, Appendix B, Performance Specification 2, Section 9; 40 CFR 60, Appendix B, Performance Specification 5, Section 1.1; 40 CFR 60, Appendix B, Performance Specification 6, Section 1.2; 40 CFR 60, Appendix F, Section 7 shall be submitted to the Department within 30 days of the date on which the corresponding RA test or RATA is completed.

[PTC No. 069-00001, 8/29/97]

12.13 In accordance with General Provision 24, the permittee shall submit to the Department copies of all excess emissions and monitoring systems performance reports as set forth in 40 CFR 60.7(b) through (d) and IDAPA 58.01.01.131 for TRS emissions. Excess TRS emissions are defined in 40 CFR 60.284(d)(3)(ii).

[PTC No. 069-00001, 8/29/97]

12.14 In accordance with General Provision 24, the permittee shall submit to the Department excess emissions and monitoring systems performance reports and/or summary reports for the SO<sub>2</sub> CERMS. The reporting requirements and report format shall comply with 40 CFR 60.7(b) through (d) and IDAPA 58.01.01.131. Excess SO<sub>2</sub> emissions are defined as SO<sub>2</sub> emissions with a three-hour rolling average, pound-per-hour value greater than the pound-per-hour emission limit in Permit Condition 12.1.

[PTC No. 069-00001, 8/29/97]

12.15 The permittee shall submit an annual report based on a calendar year listing the tons of SO<sub>2</sub> emitted from the incinerator/scrubber stack. The report is due by January 30 of each year and may be included as part of the fourth quarter report.

[PTC No. 069-00001, 8/29/97]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

#### 13. EMISSION UNIT GROUP 12 - OXYGEN DELIGNIFICATION REACTOR

Table 13.1 describes the devices used to control emissions from Emission Unit Group 12.

Table 13.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emission Units	Emission Control Device
766	Oxygen delignification reactor	None

Table 13.2 contains a summary of the requirements that apply to this source. Specific requirements are listed below Table 13.2.

Table 13.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
13.1	СО	17.0 lb/hr, 74.5 T/yr	PTC No. 069-00001	13.2 - 13.3

#### **Emission Limits**

13.1 The CO emissions from the oxygen delignification stack shall not exceed an average of 17.0 lb/hr based on a 24-hour averaging period, or 74.5 ton/yr.

[PTC No. 069-00001, 9/16/96]

## Monitoring Requirements

- 13.2 The permittee shall have developed an O&M Manual for the CO CEMS that incorporates manufacturer O&M procedures. The manual shall be updated as necessary and shall include, at a minimum, the following:
  - Normal operating conditions, parameters, and procedures
  - Guidelines for normal maintenance schedules and procedures

This manual shall remain onsite at all times and copies shall be made available to Department representatives upon request.

[PTC No. 069-00001, 9/16/96]

13.3 The permittee shall install, calibrate, maintain, and operate a monitor to continuously measure CO emissions for the oxygen delignification stack. Continuous emission monitoring shall meet 40 CFR 60.13(b), (d)(1), (e)(2) (f), (g), (h), and (i) requirements. Installation specifications and test procedures for the CEMS shall comply with 40 CFR 60, Appendix B, Performance Specification 4 requirements. The CEMS quality assurance procedure shall comply with 40 CFR 60, Appendix F. The CEMS shall also be maintained and operated according to the O&M manual.

[PTC No. 069-00001, 9/16/96]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

## Reporting Requirements

13.4 In accordance with General Provision 24, the permittee shall submit CEMS data reports on average hourly CO emissions based on daily hourly average emissions, including daily high values, in pounds per hour.

[PTC No. 069-00001, 9/16/96]

13.5 The permittee shall submit, within 30 days of the end of each calendar year, a CEMS data report for CO emissions. Total year to date emissions shall be submitted within the report.

[PTC No. 069-00001, 9/16/96]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

# 14. EMISSION UNIT GROUP 13 - CHLORINE DIOXIDE PLANT (STATE-ONLY)

Table 14.1 describes the devices used to control emissions from Emission Unit Group 13.

Table 14.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emission Units	Emission Control Device
69 and 67	Lurgi 134 and 234 HCl synthesis	Lurgi scrubber or Fiberline bleach plant scrubber

Table 14.2 contains a summary of the requirements that apply to these sources. Specific requirements are listed below Table 14.2.

Table 14.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
14.1	Cl <sub>2</sub> , ClO <sub>2</sub> and HCl	pound-per-hour and ton-per- year limits	PTC No. 069-00001	14.2 - 14.7

## **Emission Limits**

14.1 The HCl, ClO<sub>2</sub>, and Cl<sub>2</sub> emissions shall not exceed the following emission rates.

	Cl <sub>2</sub>		CIO <sub>2</sub>		HCI	
Source Description	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
134 HCl synthesis	0.16	0.7	0.16	0.7	0.53	2.3
234 HCl synthesis	0.16	0.7	0.16	0.7	0.53	2.3
Lurgi Cl <sub>2</sub> scrubber	0.26	1.1	0.26	1.1	0.15	0.7

[PTC No. 069-00001, 9/22/99 and amended 2/17/00]

## **Operating Requirements**

14.2 The Lurgi scrubber shall operate a minimum of 95% of the Lurgi operating time.

[PTC No. 069-00001, 9/22/99]

14.3 The auxiliary scrubber shall operate continuously while the Lurgi scrubber is undergoing maintenance or when needed in emergency situation.

[PTC No. 069-00001, 9/22/99]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

14.4 The make-up scrubbing-media flow rate to the auxiliary scrubber shall be a minimum of 50 gpm at any time the Fiberline bleach plant is operating and the scrubber is being used as an auxiliary scrubber for the Lurgi plant.

[PTC No. 069-00001, 9/22/99]

14.5 The permittee shall not conduct a planned shut-down of either synthesis unit while the auxiliary scrubbing system is operating.

[PTC No. 069-00001, 9/22/99]

# Monitoring Requirements

- 14.6 The permittee shall monitor and record the information listed below on a daily basis, All records shall be kept onsite for the most recent five-year period and shall be made available to Department representatives upon request.
- 14.6.1 Which scrubber is operating (Lurgi scrubber or auxiliary scrubber)
- 14.6.2 The auxiliary scrubber media flow rate while the auxiliary scrubber is operating in place of the Lurgi scrubber.

[PTC No. 069-00001, 9/22/99]

- 14.7 Within 60 days of issuance of this permit, the permittee shall have developed an O&M manual for the air pollution control equipment that incorporates manufacturer operating specifications and recommendations. The manual shall be updated as necessary and shall include, at a minimum, the following:
  - Normal operating conditions, parameters, and procedures
  - Startup, shutdown and malfunction procedures
  - Guidelines for normal maintenance schedules and procedures

The O&M manual shall remain onsite at all times and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.322.06, 5/1/94; [PTC No. 069-00001, 9/22/99]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

#### 15. EMISSION UNIT GROUP 14 - TRASH HOG

Table 15.1 describes the devices used to control emissions from Emission Unit Group 14.

Table 15.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emission Units Emission Control Device	
None	Trash hog	Cyclone

Table 15.2 contains a summary of the requirements that apply to this source. Specific requirements are listed below Table 15.2.

Table 15.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
15.1	PM	Process weight	IDAPA 58.01.01.701	15.6
15.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	15.6

## **Emission Limits**

- 15.1 No person shall discharge to the atmosphere from any source operating on or after October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:
  - a. If PW is less than 9,250 lb/hr,

 $E = 0.045(PW)^{0.60}$ 

b. If PW is equal to or greater than 9,250 lb/hr,

 $E = 1.10(PW)^{0.25}$ 

[IDAPA 58.01.01.701, 4/5/00]

15.2 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

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## **Operating Requirements**

15.3 Feed to the trash hog shall not exceed 11,000 lb/hr for a total charging period not to exceed 12 hr/day.

[PTC No. 1140-0001-315, 8/19/85]

# Monitoring Requirements

15.4 The Department may request particulate source tests when this source consistently violates the opacity limit. Should a source test be required, methods to accurately measure or estimate process weight rates shall be developed by the permittee, such that, process weight shall be measured and recorded during visible emission observations and stack tests.

[PTC No. 1140-0001-315, 8/19/85]

The permittee shall conduct quarterly one-minute observations of the trash-hog-cyclone stack using EPA Method 22 (in 40 CFR 60, Appendix A). If visible emissions are observed from any emissions point, a six-minute observation using EPA Method 9 shall be conducted or appropriate repairs shall be completed with 24 hours. A visible emissions retest shall be conducted following completion of such repairs.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

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## 16. EMISSIONS UNIT GROUP 15 - MISCELLANEOUS PROCESS SOURCES

Table 16.1 below describes the devices used to control emissions from Emissions Unit Group 15.

Table 16.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point Identification	Emission Unit(s)/Process(es)	Emission Control Device
774, 775	Sawdust transfer cyclones	None
PM	No. 1 and No. 2 papermachines	None
513, 514	Pulp dryer	None
464, 465, 466	Dry additives handling	Baghouses (3)
432	Dry fuel bins	Baghouse

Table 16.2 contains a partial summary of requirements that apply generally to these sources. Specific permit requirements are listed below Table 16.2.

Table 16.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Source ID	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
16.1	774, 775, 513, 514	PM	Process weight	IDAPA 58.01.01.702	16.4, 16.5
16.2	464, 465, 466, 432	PM	Process weight	IDAPA 58.01.01.701	16.4, 16.5
16.3	All	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	16.4, 16.5

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## **Emission Limits**

16.1 No person shall discharge to the atmosphere from any source operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

a. If PW is less than 17,000 lb/hr,

 $E = 0.045(PW)^{0.60}$ 

b. If PW is equal to or greater than 17,000 lb/hr,

 $E = 1.12(PW)^{0.27}$ 

This is applicable to source ID numbers 774, 775, PM, 513, and 514.

[IDAPA 58.01.01.702, 4/5/00]

- No person shall discharge any air pollutant to the atmosphere from any source operating on or after October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:
  - a. If PW is less than 9,250 lb/hr,

 $E = 0.045(PW)^{0.60}$ 

b. If PW is equal to or greater than 9,250 lb/hr,

 $E = 1.10(PW)^{0.25}$ 

This is applicable to source ID numbers 464, 465, 466, and 432.

[IDAPA 58.01.01.701, 4/5/00]

16.3 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

# Monitoring and Recordkeeping

16.4 The permittee shall conduct quarterly one-minute observations of each affected emissions point or source using EPA Method 22 (in 40 CFR 60, Appendix A). If visible emissions are observed from any emissions point, a six-minute observation using EPA Method 9 shall be conducted or appropriate repairs shall be completed within 24 hours. A visible emissions retest shall be conducted following completion of such repairs.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

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# 17. EMISSION UNIT GROUP 16 - SOURCES SUBJECT TO 40 CFR 63, SUBPART S

This emission unit group consists of the affected facilities subject to the NESHAP from the pulp and paper industry (40 CFR 63, Subpart S). The affected facilities, applicable requirements, and monitoring, recordkeeping, and reporting requirements are set forth in Appendix A of this permit.

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## 18. EMISSIONS UNIT GROUP 17 - INSIGNIFICANT ACTIVITIES

Activities and emissions units identified as insignificant under IDAPA 58.01.01.317.01(b) are required to be listed in the Tier I operating permit to qualify for a permit shield. These are incorporated by reference from Table 2.1 in the Potlatch Tier I permit application, dated May 1995.

18.1 There are no monitoring, recordkeeping, or reporting requirements for insignificant emissions units or activities beyond those required in the Facility-wide Permit Conditions.

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#### TIER I OPERATING PERMIT GENERAL PROVISIONS

## General Compliance

1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.

[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]

2. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.

[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]

3. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

## Reopening

4. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.

[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1) and (2); 40 CFR 70.6(a)(6)(iii)]

5. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

# **Property Rights**

6. This permit does not convey any property rights of any sort, or any exclusive privilege.

[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

# Information Requests

7. The permittee shall furnish all information requested by the Department, within a reasonable time, that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 5/1/94; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

8. Upon request by the Department, the permittee shall furnish copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

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## Severability

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

## Changes Requiring Permit Revision or Notice

10. The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/5/00; IDAPA 58.01.01.322.15.i, 380-386, 3/19/99; 40 CFR 70.4(b)(12), (14) and (15), and 70.7(d) and (e)]

11. Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 USC Permit Condition 7651 through 7651c, or are modifications under Title I of the CAA, 42 USC Permit Condition 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01. 383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) charges are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 3/19/99; IDAPA 58.01.01.209.05, 5/1/94; 40 CFR 70.4(b)(14) and (15)]

# Federal and State Enforceability

12. Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by the Department in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1) and (2)]

13. Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act, or under any of its applicable requirements, or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

## Inspection and Entry

- 14. Upon presentation of credentials, the permittee shall allow the Department or an authorized representative of the Department to do the following:
  - a. Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

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d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]

## New Requirements During Permit Term

15. The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

### Fees

16. The owner or operator of a Tier I source shall pay annual registration fees to the Department in accordance with IDAPA 58.01.01.525 through IDAPA 58.01.01.538.

[IDAPA 58.01.01.322.15.n, 5/1/94; 40 CFR 70.6(a)(7)]

### Certification

17. All documents submitted to the Department shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

### Renewal

18. a. The owner or operator of a Tier I source shall submit an application to the Department for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

b. If a timely and complete application for a Tier I operating permit renewal is submitted, but the Department fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

## Permit Shield

- 19. Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
    - i. The Department has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
  - b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).

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- c. Nothing in this permit shall alter or affect the following:
  - i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
  - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Permit Condition 7651(g)(a); and
  - iv. The ability of EPA to obtain information from a source pursuant to Permit Condition 114 of the CAA; or the ability of the Department to obtain information from a source pursuant to Idaho Code 39-108 and IDAPA 58.01.01.122.

[Idaho Code 39-108 and 112; IDAPA 58.01.01.122, 322.15.m, 325, 5/1/94; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

## Compliance Schedule and Progress Reports

- 20. a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
  - b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
  - c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
  - d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 10, 5/1/94; 40 CFR 70.6(c)(3) and (4)]

# Periodic Compliance Certification

- 21. a. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to the Department and EPA as follows:
  - b. Compliance certifications for all emissions units shall be submitted annually beginning twelve (12) months from the permit issuance date, or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by the Department;
  - c. The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
  - d. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
    - i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;

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- ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Permit Condition 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;
- iii. The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 9.21.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
- iv. Such other facts as the Department may require to determine the compliance status of the source.
- e. All original compliance certifications shall be submitted to the Department and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946, 10/22/97; 40 CFR 70.6(c)(5)(iv)]

#### False Statements

22. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

## No Tampering

23. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

## Semiannual Monitoring Reports

24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months starting six months from the date of permit issuance. All instances of deviations from this operating permit's requirements must be clearly identified in the report. All required reports must be certified in accordance with IDAPA 58.01.01.123.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

# Reporting Deviations and Excess Emissions

25. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

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# Permit Revision Not Required

26. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

# **Emergency**

27. In accordance with IDAPA 58.01.01.332, an "Emergency" as defined in IDAPA 58.01.01.008., constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 3/19/99; 40 CFR 70.6(g)]